



MURIEL GOODE-TRUFANT
Acting Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

KATHLEEN M. LINNANE
Assistant Corporation Counsel
Labor and Employment Law Division
Telephone: (212) 356-2467
E-mail: klinnane@law.nyc.gov

July 8, 2024

By ECF

Honorable Lois Bloom
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Hill v. The Department of Education of the City of New York
1:24-cv-03506-RPK-LB

Dear Judge Bloom:

I am an Assistant Corporation Counsel in the office of Muriel Goode-Trufant, Acting Corporation Counsel for the City of New York, attorney for the defendant the Department of Education of the City of New York (“DOE”) in the above-referenced action. I write to respectfully request an extension of time for Defendant to respond to the complaint from July 11, 2024 to August 23, 2024. This is Defendant’s first request for an extension of time to respond to the complaint, and the requested extension does not affect any scheduled dates. Pro se plaintiff has consented to Defendant’s request for an extension, and has requested that her time to submit a response thereafter be due on or before October 7, 2024.

An extension of time until August 23, 2024 will allow this Office to adequately investigate the allegations made in the Complaint and prepare a proper response. The complaint in this matter contains multiple allegations of discrimination and retaliation against the DOE. Additional time is needed to collect and review documents in order to appropriately respond to the complaint and to speak with potential witnesses concerning the allegations.

Therefore, this Office respectfully requests that the Court grant the request for an extension of Defendant’s time to respond to the complaint to August 23, 2024.

Thank you for your consideration of this request.

Respectfully submitted,
/s/
Kathleen M. Linnane
Assistant Corporation Counsel

cc: All Parties of Record (By ECF)
B. Hill (By email at b.cazeau@gmail.com and by United States Postal Service to 1423 East 104 Street, Brooklyn, New York 11236)